

RUHNKE & BARRETT
ATTORNEYS AT LAW

47 PARK STREET
MONTCLAIR, N.J. 07042
973-744-1000
973-746-1490 (FAX)

29 BROADWAY
SUITE 1412
NEW YORK, N.Y. 10006
212-608-7949

DAVID A. RUHNKE (davidruhnke@ruhnkeandbarrett.com) ◇ JEAN D. BARRETT (jeanbarrett@ruhnkeandbarrett.com)

LETTER-MOTION—ON CONSENT—TO CONTINUE

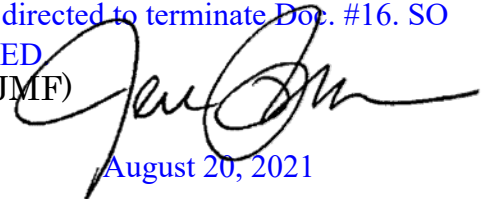
Via ECF

Hon. Jesse M. Furman, U.S.D.J.
Thurgood Marshall United States Courthouse
New York, N.Y. 10007

Re: *United States v. Cesar Abreu*, 21-cr-300(JMF)

Dear Judge Furman:

Application GRANTED. The conference is hereby ADJOURNED to November 2, 2021, at 11:00 a.m. Time is excluded in the interests of justice from today, August 20, 2021, until November 2, 2021, to enable counsel and the Defendant to effectively confer. The Clerk of Court is directed to terminate Doc. #16. SO ORDERED



August 20, 2021

This letter-motion is respectfully submitted to request an alteration of our current schedule. The United States consents to the relief requested.

The Court has scheduled a status conference in this matter for August 31 at 2:30pm. Defendant seeks a 30-day continuance of that date. During that period, it is expected that the United States will extend a written plea offer to be discussed by counsel with Mr. Abreu. Undersigned counsel is scheduled to begin a jury trial before the Hon. Valerie E. Caproni of this district on Monday, August 23, 2021. The parties in that case believe, but of course cannot guarantee, that the trial will conclude by the end of that week. The requested continuance will allow counsel adequate time to receive, review and discuss with Mr. Abreu any proposed resolution of the case. Additionally, any discussion with Mr. Abreu will have to include the services of a qualified Spanish interpreter. Defendant consents to any appropriate exclusion of time pursuant to the Speedy Trial Act.

Your Honor's time and attention to this request are appreciated.

Respectfully yours,
/s/ David A. Ruhnke
Attorney for Cesar Abreu

cc: AUSA Andrew Rorhbach, via ECF